

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CRAIG MOSKOWITZ, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PULLIN LAW FIRM, P.C., a New York
corporation,

Defendant.

Case No.: 2:14-cv-06010-LDW-AKT

DECLARATION OF PRESTON W. LEONARD

I, Preston W. Leonard, hereby aver, pursuant to 28 U.S.C. § 1746, that I have personal knowledge of all matters set forth herein unless otherwise indicated, and would testify thereto if called as a witness in this matter.

1. I am an adult over the age of 18 and a resident of the Commonwealth of Massachusetts. I am an attorney with the law firm Leonard Law Office, P.C., which has an office in Massachusetts. I am licensed to practice law in the District of Massachusetts and am one of the attorneys representing the Plaintiff in this matter. I am fully competent to make this Declaration and make such Declaration in support of Plaintiffs' Memorandum of Law in Support of His Motion for Class Certification and for a Temporary Stay of Further Proceedings on that Motion.

2. I have in-depth knowledge of the substantive law at issue in this case. I have represented plaintiffs as Class Counsel in TCPA class actions in various federal courts. *See, e.g., Russell et. al. v. 29 Prime, Inc.*, C.A. No 1:2013-cv-12814 (D. Mass.); *IN RE: Hangtime, Inc., Telephone Consumer Protection Act (TCPA) Litigation* (MDL No.

2563); *Grugnale et. al. v. Specialized Loan Servicing, LLC*, C.A. No 1:2014-cv-12534 (D. Mass.); *Harnish et. al. v. TicToc Planet*, C.A. No 5:2014-cv-02321-PSG (N.D. Cal.); *McKenna et. al. v. Whispertext, LLC*, C.A. 5:2014-cv-00424-PSG (N.D. Cal.); *Grugnale et. al. v. Specialized Loan Servicing, LLC*, C.A. No 1:2014-cv-12534 (D. Mass.); *Newbold et. al. v. State Farm Automobile Insurance Company*, C.A. No 1:13-cv-09131 (N.D. Ill.).

3. In addition to my TCPA class action experience, I have extensive experience in consumer class actions and have regularly litigated class actions in state and federal trial courts. *See, e.g., Perry et al. v. Equity Residential Mgmt., LLC*, No. 12-10779-RWZ (D. Mass.); *IN RE: L'Oreal Wrinkle Cream Marketing and Sales* (MDL-2415); *Miller et. al. v. J. Crew Group, Inc.*, C.A. No 1:2013-cv-11487 (D. Mass.); *IN RE: Target Corporation Customer Data Breach Litigation* (MDL No. 14-2522); *Doulamis et al. v. The Boston Institute for Psychotherapy et. al*, C.A. No 1:2014-cv-11434 (D. Mass.); *Derby et. al. v. Jos. A. Bank Clothiers, Inc.*, C.A. No 1:2014-cv-12347 (D. Mass.); *Mazard et. al. v. BTLS, Inc. d/b/a Balise Toyota*, C.A. No 14-1736 BLS1 (Suffolk Super. Ct., Mass.,).

4. I graduated with a B.S. in Psychology from Boston University in 2000 and I graduated from Massachusetts School of Law with an academic award in consumer law in 2010. I was first admitted to practice in 2011 by the Supreme Judicial Court of Massachusetts.

5. The attorneys of Leonard Law Office, P.C. have extensive experience in prosecuting class actions and other complex litigation of a similar nature, scope and complexity as the instant matter. The attorneys of Leonard Law Office, P.C. have intimate knowledge of the law in the field of telecommunications and cellular telephone technology, including cases arising under the TCPA.

6. Leonard Law Office, P.C. has diligently investigated the facts and claims in this matter and will continue to diligently investigate and prosecute this matter. Leonard Law Office, P.C. has also dedicated substantial resources to this matter and will continue to do so. Leonard Law Office, P.C. has the financial resources necessary to fully prosecute this action through trial and to provide the necessary and appropriate notice to the class members should this proposed class be certified.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10 / 1, 2014.

/s/ Preston W. Leonard
Preston W. Leonard